

EXHIBIT A

Christopher Nelson, Vol 1

June 02, 2017

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE SEAGATE TECHNOLOGY LLC
LITIGATION,

CASE NO. 5:16-CV-00523-RMW

CONSOLIDATED ACTION,

VIDEOTAPED DEPOSITION OF CHRISTOPHER NELSON

San Francisco, California

Friday, June 2, 2017

Reported by: Ashley Soevyn, CSR No. 12019

Job No. 2257

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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
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5 IN RE SEAGATE TECHNOLOGY LLC
6 LITIGATION,
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8 CASE NO. 5:16-CV-00523-RMW
9

10 CONSOLIDATED ACTION,
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14 Videotaped Deposition of CHRISTOPHER
15 NELSON taken on behalf of defendants, at Four
16 Embarcadero Center, 17th Floor, San Francisco,
17 California, beginning at 9:36 a.m. and ending at
18 4:02 p.m. on Friday, June 2, 2017, before ASHLEY
19 SOEVYN, Certified Shorthand Reporter No. 12019.
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25

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A P P E A R A N C E S

For the Plaintiffs

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-and TENAYA RODEWALD

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ALSO PRESENT: Philip Knowles, Videographer

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I N D E X

DEPOSITION OF CHRISTOPHER NELSON

EXAMINATION BY:

PAGE

MR. POPOVIC

8

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1 Q Did Seagate send you, at some point, a
2 customer feedback survey about that drive?

3 A I don't recall.

4 Q Do you recall ever responding to a
5 Seagate customer feedback survey?

6 A No, but that doesn't mean I wouldn't
7 have.

8 Q You just don't recall one way or the
9 other?

10 A I don't recall.

11 MR. POPOVIC: What exhibit are we on?

12 THE REPORTER: Exhibit 14.

13 (Exhibit 14 marked for identification.)

14 BY MR. POPOVIC:

15 Q Mr. Nelson, the court reporter has just
16 handed you a document marked Exhibit 14. The top,
17 it says "tigerdirect.com." And it has Bates No.
18 PLTFS_000095 through PLTFS_000096. Have you seen
19 this document before?

20 A Yes.

21 Q What is it?

22 A It's an order.

23 Q An order for what?

24 A Hard drives.

25 Q These are hard drives that you purchased

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1 from tigerdirect.com?

2 A That's correct.

3 Q And it appears to have an order date of
4 February 26, 2015. Do you recall purchasing Seagate
5 hard drives from Tiger Direct?

6 A Yes.

7 Q At that time?

8 A Yes.

9 Q And it includes, on the second page,
10 reference to a Seagate 1TB hard drive, and a Seagate
11 3TB internal desktop hard drive. Do you see that?

12 A I do.

13 Q Is it your understanding that either of
14 those drives is at issue in this lawsuit?

15 A The second one, I would assume.

16 Q Why do you assume that?

17 A Because that's the model number, and
18 that's the three-terabyte hard drive.

19 Q And this is a three-terabyte hard drive
20 other than the three-terabyte hard drive that you
21 purchased at Best Buy; is that correct?

22 A That is correct.

23 Q What's the status of this Seagate
24 three-terabyte internal desktop hard drive that you
25 purchased from tigerdirect.com?

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1 A Can you be --

2 Q Do you still have it?

3 A I do.

4 Q Is it still functioning?

5 A I have no idea.

6 Q Do you use it?

7 A I do not.

8 Q Did you ever use it?

9 A I can't -- I can't -- it's never been
10 installed on a computer.

11 Q Why not?

12 A Well, the computers I have are all-in-one
13 computers, so it wouldn't fit.

14 Q Why did you purchase it?

15 A In case the hard drive inside the
16 enclosure failed, I was going to replace it.

17 Q In case the hard drive inside which
18 enclosure failed?

19 A Whichever.

20 Q So this was just a -- to have an extra
21 drive around in case one or another of your drives
22 failed?

23 A Right.

24 Q So you did not ever install this Seagate
25 three-terabyte internal desktop hard drive into a

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1 computer?

2 A No.

3 Q And you didn't install it into the casing
4 for an external drive, either, did you?

5 A I did for a short period of time.

6 Q When was that?

7 A Probably around the time that I received
8 it, so that I could run the SeaTool software on it
9 and ensure that it was not defective from the go.

10 THE REPORTER: From the what?

11 THE WITNESS: From the start.

12 THE REPORTER: Oh. "From the go," you
13 said. Okay.

14 BY MR. POPOVIC:

15 Q What kind of enclosure did you install?

16 A Generic enclosure. I don't know the
17 manufacturer.

18 Q But it wasn't, for example -- well, for
19 example, it wasn't in a Seagate enclosure that you
20 had taken another drive out of?

21 A No.

22 Q Did this drive that you purchased from
23 tigerdirect.com fail?

24 A It has -- I have no idea. I haven't used
25 it since probably the time that I tested it. It's

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1 sitting on the shelf with the other one.

2 Q Do you have any plans to use it?

3 A No.

4 Q Why not?

5 A Because I don't think it's suitable to
6 the purpose.

7 Q Do you recall when you tested it whether
8 it had any symptoms of any problems?

9 A I don't recall any.

10 THE REPORTER: Exhibit 15.

11 (Exhibit 15 marked for identification.)

12 BY MR. POPOVIC:

13 Q Mr. Nelson, the court reporter has just
14 handed you what's been marked as Exhibit No. 15,
15 which appears to be your responses to Seagate's
16 First Set of Request for Production of Documents to
17 the Plaintiffs. Have you seen this document before?

18 A Can I take a moment to take a look at it?

19 Q Please.

20 A Yes.

21 MR. POPOVIC: Okay. What was the
22 question?

23 (Record read.)

24 THE WITNESS: Yes.

25



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Order Number	J9643385	Order date	02/26/2015
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CHRIS NELSON

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SIOUX FALLS, SOUTH DAKOTA 57107
UNITED STATES

4301 N MONTANA AVE
SIOUX FALLS, SOUTH DAKOTA 57107
UNITED STATES

PAYMENT INFORMATION

Purchase Order

EXHIBIT 14**Christopher Nelson**

Date: 6/2/17

Rptr: Ashley Soevyn CSR# 12019

PLTFS_000095

Order Summary

Product	Item #	Qty	Price	Extended Price	Expected Ship Date
SEAGATE 1TB HARD DRIVE - 7200RPM, 64MB, SATA 6GB/S, OEM PACKAGE - ST1000DM003	TSD-1000AS7	1	51.44	51.44	02/27/2015

Manuf Part No: ST1000DM003

Shipping Method: UPS - UPS BASIC

SEAGATE 3TB INTERNAL DESKTOP HARD DRIVE - 3.5" FORM FACTOR, SATA III 6 GB/S, 64 MB CACHE, OEM PACKAGE - ST3000DM001	TSD-3000AS2	1	93.54	93.54	02/27/2015
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Manuf Part No: ST3000DM001

Shipping Method: UPS - UPS BASIC

My goal is to provide exemplary service and I take pride in exceeding the expectations of every customer. If I can be of service or if you have any feedback whatsoever please don't hesitate to respond to this email or call me at: 1-(800) 800-8300.

Subtotal: 144.98

Shipping: 0.00

Tax: 8.70

Extended Price: 153.68

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